

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GLOBAL TECH INDUSTRIES GROUP,
INC.,

Plaintiff,
v.

CANACCORD GENUITY LLC, CREDIT
SUISSE SECURITIES (USA) LLC,
INSTINET, LLC, LIME TRADING CORP.,
GTS SECURITIES LLC, and JOHN DOES
1-50,

Defendants.

Case No. 1:23-cv-02139

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of Peter G. Wilson and the exhibits attached thereto, and any other arguments or materials that the Court may consider before this motion is taken under submission by the Court, Defendants¹ GTS Securities LLC, Credit Suisse Securities, (USA), LLC, and Lime Trading Corp., will jointly move this Court, before the Honorable Jessica G. L. Clarke, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be set by the Court, for an order (i) pursuant to Federal Rule of Civil Procedure 12(b)(6) and the Private Securities Litigation Reform Act, dismissing the Amended Complaint (ECF No. 58); and (ii) granting all such other and further relief as this Court may deem just and proper.

¹ Defendants Canaccord Genuity LLC and Instinet, LLC filed stipulations of dismissal in this case.

Opposition and reply papers are to be filed pursuant to the Court's Order (ECF No. 62) and Rule 6.1 of the Local Rules of the United States District Court for the Southern District of New York.

Dated: October 25, 2023

Respectfully submitted,

KATTEN MUCHIN ROSENMAN LLP

/s/ Peter G. Wilson

Peter G. Wilson

Christian T. Kemnitz (admitted *pro hac vice*)

Benjamin C. Levine (admitted *pro hac vice*)

525 West Monroe Street

Chicago, Illinois 60661-3693

Telephone: (312) 902-5200

peter.wilson@katten.com

christian.kemnitz@katten.com

benjamin.levine@katten.com

Attorneys for Defendant GTS Securities LLC

CAHILL GORDON & REINDEL LLP

/s/ Herbert S. Washer (with permission)

Herbert S. Washer

Jason M. Hall

32 Old Slip

New York, New York 10005

Telephone: (212) 701-3000

hwasher@cahill.com

jhall@cahill.com

*Attorneys for Defendant Credit Suisse
Securities (USA) LLC*

KEESAL, YOUNG & LOGAN

A Professional Corporation

/s/ Stephen Young (with permission)

Stephen Young (admitted *pro hac vice*)

Elizabeth H. Lindh (admitted *pro hac vice*)

400 Oceangate Avenue, Suite 1400

Long Beach, California 90802

Telephone: (562) 436-2000

steve.young@kyl.com

elizabeth.lindh@kyl.com

Attorneys for Defendant Lime Trading Corp.